

1 REMARKS

2 Status of the Claims

3 Claims 1-11 and 13-26 remain pending in the application, Claim 12 having been previously
4 cancelled. None of the claims have been amended.

5 Claims Rejected Under 35 U.S.C. § 103(a)

6 The Examiner has rejected Claims 1-5 as being unpatentable under 35 U.S.C. § 103 over
7 Microsoft Outlook 2000 (version 9.0.0.4527; copyright 1999, hereinafter referred to as "Outlook"), in
8 view of Thompson et al. (U.S. Patent Publication No. 2001/0003183, hereinafter referred to as
9 "Thompson"), and further in view of Uyehara et al. (U.S. Patent No. 6,154,214, hereinafter referred
10 to as "Uyehara").

11 The Examiner has also rejected Claim 6 as being unpatentable over Outlook, in view of
12 Thompson, and further in view of Yahoo (Non Patent Literature, Nov. 9, 2000 and Sept. 8, 1999).

13 The Examiner has rejected Claims 7-10 as being unpatentable over Gehani et al. (U.S. Patent
14 No. 5,946,687, hereinafter referred to as "Gehani"), and further in view of Uyehara.

15 The Examiner has rejected Claims 11, 13-14, 18-19, 21, and 22 as being unpatentable over
16 Outlook, in view of Gehani.

17 The Examiner has rejected dependent Claims 15 and 16 as being unpatentable over Outlook
18 in view of Gehani, and further in view of Concepts' Wordworks (Non Patent Literature, copyright
19 May 1997, hereinafter known as "Wordworks").

20 The Examiner has rejected dependent Claim 17 in view of Outlook, in view of Gehani, and in
21 view of Microsoft Word (Non Patent Literature, copyright 1999 hereinafter known as "MS-Word").

22 The Examiner has rejected dependent Claim 20 in view of Outlook, in view of Gehani, and in
23 view of Thompson.

24 The Examiner has rejected Claims 23-24 as being unpatentable over Thompson in view of
25 Wordworks, and further in view of Uyehara.

26 The Examiner has rejected Claims 25-26 as being unpatentable over Thompson in view of
27 Wordworks, and further in view of MS-Word.

28 In the interest of reducing the complexity of the issues for the Examiner to consider in this
29 response, the following discussion focuses on independent Claims 1, 7, 11, and 23. The patentability
30 of each remaining dependent claim is not necessarily separately addressed in detail. However,

1 applicants' decision not to discuss the differences between the cited art and each dependent claim
2 should not be considered as an admission that applicants concur with the Examiner's conclusion that
3 these dependent claims are not patentable over the disclosure in the cited references. Similarly,
4 applicants' decision not to discuss differences between the prior art and every claim element, or every
5 comment made by the Examiner, should not be considered as an admission that applicants concur
6 with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants believe
7 that all of the dependent claims patentably distinguish over the references cited. In any event, a
8 specific traverse of the rejection of each dependent claim is not required, since dependent claims are
9 patentable for at least the same reasons as the independent claims from which the dependent claims
10 ultimately depend.

11 Patentability of Claim 1

12 Significant differences exist between independent Claim 1 and the cited art because the cited
13 art does not teach or suggest both a string and an identifier that is unique, as recited in applicants'
14 first step, as "identifying a string having a unique identifier associated with the string." Under the
15 section entitled "Response to Arguments," the Examiner responded to applicants' argument that
16 Outlook fails to disclose a string that is associated with a unique identifier associated with
17 information, by citing the Uyehara reference (Office Action, page 17). The Examiner asserts that
18 "Outlook does not expressly teach a unique identifier," but asserts that "Thompson teaches that a
19 name can be a unique identifier that is associated with a string (paragraph 27).

20 Furthermore, although Outlook, in view of Thompson does not expressly teach a unique
21 identifier, the Examiner asserts that Uyehara teaches this recitation. More specifically, the Examiner
22 refers to Uyehara's teaching of an electronic reading system that allows a user to download books or
23 content to hand-held reader device for viewing as well as allowing the user to look up the displayed
24 word in a dictionary. The Examiner interprets that the dictionary contains unique identifiers,
25 especially upon reading the applicants' specification and in support of his assertion, the Examiner
26 cites the Abstract of Uyehara. In addition, the Examiner asserts that it would have been obvious to
27 one of ordinary skill in the art at the time of the invention to modify Outlook to include a name as a
28 unique identifier, as taught by Thompson, providing the benefit of formulating information requests
29 in complex query languages (with reference to Thompson, paragraph 16), and further to include a
30 hand-held device that has a dictionary look up feature, as taught by Uyehara, providing the benefit of

1 a user interface, which is simple and intuitive to use, and which allows users to take advantage of the
2 content's digital form, so users have incentive to use the digital system in place of a printed
3 publication (i.e., a dictionary). In support of his assertion, the Examiner cites column 1, lines 32-38
4 of Uyehara.

5 The Examiner has indicated he believes that a dictionary contains a *unique identifier*. In
6 addition, the Examiner has indicated he believes that "sain" is equivalent to applicants' recited *string*.
7 (Office Action, page 3 and Item b, page 1 of Outlook). However, this combination still does not
8 teach or suggest all of the claim recitation of applicants' first step. If one identifies a string, such as
9 "sain" and a dictionary is accessed, once again, no unique identifier exists for "sain," even in a
10 dictionary, because the string "sain" could correspond to the word "saint" or the word "sain" or the
11 word "sainfoin." Clearly, "sain" is not unique and cannot be a unique identifier associated with a
12 string. Thus, the cited art still does not teach both a string and an identifier that is unique and is
13 associated with the string. Accordingly, since Outlook, in view of Thompson, in view of Uyehara
14 neither teaches nor suggests all of the recitation of independent Claim 1, the rejection of independent
15 Claim 1 under 35 U.S.C. § 103(a) should be withdrawn.

16 Because dependent claims include all of the elements of the independent claim from which
17 the dependent claims ultimately depend, dependent Claims 2-6 are patentable for at least the reasons
18 discussed above in regard to independent Claim 1. Accordingly, the rejection of dependent Claims 2-
19 6 under 35 U.S.C. § 103(a) should be withdrawn.

20 Patentability of Independent Claim 7

21 Significant differences exist between the cited art and applicants' recitation included in the
22 second step and in the last step of independent Claim 7, because the cited art does not teach or
23 suggest "determining that *an identity of a user is relevant* to the selected reference material" and does
24 not teach or suggest "providing the selected reference material *in a manner that is relevant* to the
25 identified user."

26 Under the section entitled "Response to Arguments," the Examiner responds to applicants'
27 argument that the references do not teach information retrieved in a record must be provided in a
28 manner relevant to an identified user by asserting that the Uyehara reference specifically teaches this
29 step. The Examiner admits that Gehani does not expressly teach a selected reference material, but
30 asserts that Uyehara does. More specifically, the Examiner asserts that an electronic reading system

1 that allows the user to download books or content to hand-held reader device for viewing, as well as
2 allowing the user to look up the displayed word in a dictionary, corresponds to the claim recitation.
3 The Examiner interprets that the dictionary contains unique identifiers, especially upon reading
4 applicants' specification so as to support this assertion, citing the Abstract of Uyehara. The Examiner
5 asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention
6 to interpret Gehani's teachings of maps and yellow pages information as reference material,
7 providing the benefit of a personal information manager known by an address book, including name
8 and an address, that provides a user with maps and directions. In support of his assertion, he cites
9 column 1, lines 17-60 of the reference. In addition, he notes that Uyehara includes a hand-held
10 device that has a dictionary look up feature, providing the benefit of a user interface that is simple
11 and intuitive to use, which allows users to take advantage of the content's digital form, so users have
12 incentive to use the digital system in place of a printed publication (i.e., a dictionary). In support of
13 his assertion, the Examiner cites column 1, lines 32-38 of Uyehara, which is reproduced below:

14 In order for such a system to appeal to the mass public, it is important that the reader
15 device have a user interface which is simple and intuitive to use. In addition, the
16 device should provide functions which take advantage of the content's digital form, so
17 that users have the incentive to use the system in place of printed publications.
18 Further, the device should be comfortable to hold during prolonged viewing session.
(Uyehara, column 1, lines 30-38.)

19 However, Uyehara and Gehani in combination still do not teach or suggest the claim
20 recitation of applicants' second and last steps. In fact, the above citation appears to teach away from
21 determining that an identity of a user is relevant, because the system will reproduce printed
22 publications regardless of the identity of the user. Printed publications are intended for general use
23 by anyone and do not suggest tailoring of the reference material to a specific user. In addition,
24 Uyehara indicates that a user can download books and other types of content (Uyehara, Abstract), but
25 Uyehara still does not teach that the identity of the user downloading the books and other types of
26 content is relevant to the selected reference material that is provided or that the reference material is
27 provided in a manner that is relevant to the user.

28 Accordingly, the rejection of independent Claim 7 under 35 U.S.C. § 103(a) should be
29 withdrawn because the cited art fails to teach or suggest all of the claim recitation components of
30 independent Claim 7.

1 Because dependent claims include all of the elements of the independent claim from which
2 the dependent claims ultimately depend, dependent Claims 8-10 are patentable for at least the reasons
3 discussed above in regard to independent Claim 7. Accordingly, the rejection of dependent Claims 8-
4 10 under 35 U.S.C. § 103(a) should be withdrawn.

5 Patentability of Independent Claim 11

6 Under the section entitled "Response to Arguments," the Examiner has not specifically
7 addressed applicants' argument with respect to independent Claim 11, but the Examiner states that he
8 maintains the rejection because the combination of references when viewed in their entirety teach the
9 claimed subject matter, and one of ordinary skill in the art at the time of the invention would have
10 been motivated to combine the references to arrive at the claimed subject matter.

11 However, for reasons similar to those noted above in traversing the rejection of independent
12 Claim 1, Claim 11 recites a string having a *unique* identifier associated with the string. However, the
13 cited art does not teach or suggest a string and a unique identifier associated with the string.
14 Accordingly, the rejection of independent Claim 11 under 35 U.S.C. § 103(a) should be withdrawn.

15 Because dependent claims include all of the elements of the independent claim from which
16 the dependent claims ultimately depend, dependent Claims 13, 14, 18, 19, 21, and 22 are patentable
17 for at least the reasons discussed above in regard to independent Claim 11. Accordingly, the
18 rejection of dependent Claims 13, 14, 18, 19, 21, and 22 under 35 U.S.C. § 103(a) should be
19 withdrawn.

20 Patentability of Independent Claim 23

21 Significant differences exist between the cited art and applicants' Claim 23, because the cited
22 art does not teach or suggest the temporal aspect of applicants' dictionary interface. Under the
23 section entitled "Response to Arguments," the Examiner responds to applicants' argument that the
24 references do not teach a dictionary control provided in a user interface by asserting that the Uyehara
25 reference specifically teaches this claimed feature (Office Action, page 17). The Examiner admits
26 that Thompson, in view of Wordworks does not expressly teach a dictionary control provided in the
27 user interface, but asserts that Uyehara does teach this limitation. Specifically, the Examiner refers to
28 an electronic reading system that allows the user to download books or content to hand-held reader
29 device for viewing, as well as allowing the user to look up the displayed word in a dictionary. The
30 Examiner interprets that the dictionary contains unique identifiers, especially upon reading

1 applicants' specification. In support of his assertion, the Examiner cites the Abstract of Uyehara.
2 The Examiner asserts that it would have been obvious to modify Thompson to include the definition
3 of a word from the dictionary where the definition is displayed in the user interface as taught by
4 Wordworks, providing the benefit of a simple but effective tool that is a must for all serious users
5 who produce a lot of text (Wordworks, page 2, bottom), further to include a hand-held device that has
6 a dictionary look up feature, as taught by Uyehara, providing the benefit of a user interface that is
7 simple and intuitive to use, which allows users to take advantage of the content's digital form, so
8 users have incentive to use the digital system in place of a printed publication (i.e., a dictionary). In
9 support of his assertion, he cites column 1, lines 32-38 of Uyehara. Applicants respectfully disagree
10 for the reasons noted below.


11 As explained in the response to the previous Office Action, applicants' disagree with the
12 Examiner that the motivation to combine the cited art exists, even if Uyehara is included in the
13 combination. However, even if the motivation did exist to combine the cited art, the cited art still
14 does not teach or suggest all of applicants' claim recitation. The first step of applicants' claim recites
15 "in response to a selection of a dictionary control provided in the user interface of the application
16 program, displaying a dictionary interface on a display device." This first step occurs prior to the
17 other recited steps being carried out. In contrast, Uyehara does not disclose that a dictionary interface
18 is displayed on a display device *prior* to any action being taken to provide a definition. In contrast,
19 Uyehara discloses how tapping on a word twice brings up a dictionary definition (Uyehara, column 9,
20 lines 45-47), and as shown in Figure 9 and Figure 10, in pop-up window 130. Thus, the cited art does
21 not teach or suggest applicants' claim recitation that "in response to a selection of a dictionary control
22 provided in the user interface of the application program, displaying a dictionary interface on a
23 display device." The cited art does not operate in the manner claimed by applicants.

24 Accordingly, the rejection of independent Claim 23 under 35 U.S.C. § 103(a) should be
25 withdrawn. Because dependent claims include all of the elements of the independent claim from
26 which the dependent claims ultimately depend, dependent Claims 24-26 are patentable for at least the
27 reasons discussed above in regard to independent Claim 23, and the rejection of dependent
28 Claims 24-26 under 35 U.S.C. § 103(a) should be withdrawn.

29 In view of the Remarks set forth above, it will be apparent that the claims in this application
30 define a novel and non-obvious invention. The application is in condition for allowance and should

1 be passed to issue without further delay. Should any further questions remain, the Examiner is
2 invited to telephone applicants' attorney at the number listed below.

3 Respectfully submitted,

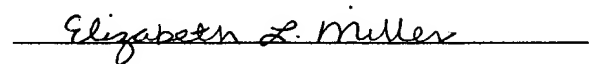
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10 MAILING CERTIFICATE

11 I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a
12 sealed envelope as first class mail with postage thereon fully prepaid addressed to: Commissioner for
13 Patents, Alexandria, VA 22313-1450, on March 23, 2006.

14 Date: March 23, 2006

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